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December 22, 2004

Mail Stop Appeal Brief - Patents
Commissioner for Patents
PO Box 1450
Alexandria, VA 22313-1450

Re:	Application Serial No.:	09/505,594
	Appellants:	Jay Paul Drummond, et al.
	Filing Date:	February 16, 2000
	Confirmation No.:	5969
	Title:	Method And System For Connecting Services To Automated Transaction Machine
	Docket No.:	D-1120 R1

Sir:

Please find enclosed the Brief of Appellant pursuant to 37 C.F.R. § 41.37 for filing in the above-referenced application.

Please charge the fee required with this filing ($500) and any other fee due to Deposit Account 09-0428 of InterBold.

Very truly yours,

Ralph E. Jocke
Reg. No. 31,029

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Ralph E. Jocke

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In Re Application of:)	
Jay Paul Drummond, et al.)	
)	Art Unit **3624**
Serial No.: **09/505,594**)	
)	
Confirm. No.: **5969**)	
)	
Filed: **February 16, 2000**)	Patent Examiner
)	**Narayanswamy**
For: **Method And System For**)	**Subramanian**
Connecting Services To An)	
Automated Transaction Machine)	

Mail Stop Appeal Brief - Patents
Commissioner for Patents
PO Box 1450
Alexandria, VA 22313-1450

BRIEF OF APPELLANTS PURSUANT TO 37 C.F.R. § 41.37

Sir:

The Appellants hereby submit their Appeal Brief pursuant to 37 C.F.R. § 41.37

concerning the above-referenced Application.

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(i) **REAL PARTY IN INTEREST**

The Assignee of all right, title and interest to the above-referenced Application is

Diebold, Incorporated, an Ohio corporation.

(ii) RELATED APPEALS AND INTERFERENCES

U.S. application serial no. 09/811,718 filed March 19, 2001 is a divisional of the present case and is currently on appeal before the Board of Patent Appeals and Interferences. It is believed that this other appeal does not pertain to the claimed subject matter. However, it is respectfully requested that the Board make its own determination regarding the pertinence of this other application. Appellants, Appellants' legal representative, and assignee believe that there are no additional related appeals or interferences pertaining to this matter.

(iii)   **STATUS OF CLAIMS**

Claims 1-54 are pending in the Application.

Claims rejected:	1-11, 45 and 46
Claims allowed:	none
Claims confirmed:	none
Claims withdrawn:	12-44 and 47-54
Claims objected to:	none
Claims canceled:	none

Appellants appeal the rejections of claims 1-11, 45 and 46. These claim rejections were the only claim rejections present in the Office Action ("Action") dated August 10, 2004, which was made Final. Appellants Response filed September 17, 2004 requesting withdrawal of premature final rejection was not acted on by the Office prior to the filing of Appellant's Notice of Appeal on November 7, 2004.

(iv)   STATUS OF AMENDMENTS

A final rejection was made August 10, 2004. No amendments to the claims were requested to be admitted after the final rejection.

Additional Comment: A typographical error is present in claim 11. The term "funciton" should be replaced with --function--. Appellants are willing to correct claim 11 after resolution of the Appeal.

(v)   SUMMARY OF CLAIMED SUBJECT MATTER

Concise explanations of exemplary forms of the claimed invention:

With respect to independent claim 1

An exemplary form of the invention is directed to an automated transaction machine (10) (Figure 1; page 1, lines 7-12; page 17, lines 1-2). Examples given for an automated transaction machine include an Automated Teller Machine (ATM) and other self service terminals. In the exemplary form of the invention as recited in claim 1, the automated transaction machine comprises a plurality of transaction function devices. Examples given in the Specification include cash dispensers, cash acceptors, card readers, depositories, and printers (page 9, lines 13-15). In the Specification the described transaction function devices are also referred to as transaction services such as a cash dispenser service (14), print service (16), a card reader service (18) and a user interface service (12) (page 17, lines 2-5).

Each transaction function device or service (112) includes an associated device computer processor (118) (Figure 3; page 10, lines 8-9; page 20, line 5). At least one device computer processor associated with a first transaction function device (168) is operative responsive to being placed in operative connection with at least one other device computer processor associated with a second transaction function device (130), to cause the first transaction function device to become automatically interoperative with the second transaction function device (Figure 4; page 10, lines 3-4; page 11, lines 3-21; page 20, lines 19-21). Figures 5-7 show examples of a discover protocol (190), join protocol (220), and lookup protocol (230) used in an

exemplary form of the invention for automatically configuring transaction function devices or services in an ATM (page 22, line 4 to page 26, line 14).

In an exemplary form of the invention, the automated transaction machine includes a data store (162) that is in operative connection with both the first transaction function device (168) and the second transaction function device (130) (Figure 4). In an exemplary form of the invention a lookup service (162) serves as a data store that is operative to store a copy of a service proxy (166) (page 11, lines 4-6). Such service proxies (166) correspond to device drivers (page 10, lines 11-12).

The second transaction function (130) device is operative to communicate a device driver (148) from the second transaction function device (130) to the data store (162) so that a copy (166) of the device driver for the second transaction function device is stored in the data store (Figure 4; page 21, lines 3-4). The first transaction function device (168) is operative to access a copy (166) of the device driver for the second transaction function device from the data store (162) (page 21, lines 10-12). The device computer processor associated with the first transaction function device (168) is operative responsive to the device driver for the second transaction function device to interact with the second transaction function device (130) in carrying out a financial transaction with the automated transaction machine such as an ATM cash dispense (Figure 8; page 21, lines 10-14; page 23, line 21 to page 25, line 12).

With respect to independent claim 4

Another exemplary form of the invention is directed to an automated transaction machine (10) (Figure 1; page 1, lines 7-12; page 17, lines 1-2) comprising a plurality of transaction

function devices (12, 14, 16, 18) (page 9, lines 13-15; page 17, lines 2-5). The described transaction functions devices are also referred to as transaction services. Each transaction function device includes an associated device computer processor (118) (Figure 3; page 10, lines 8-9; page 20, line 5). At least one device computer processor associated with a first transaction function device (168) is operative responsive to being placed in operative connection with at least one other device computer processor associated with a second transaction function device (130), to cause the first transaction function device (168) to become automatically interoperative with the second transaction function device (130). The first transaction function device (168) interacts with the second transaction function device (130) in carrying out a financial transaction with the automated transaction machine.

In this described exemplary form of the invention, the automated transaction machine (10) further comprises a network (10). The network is in operative connection with at least one data store (22, 162). The data store includes a transaction function device driver (166). The device computer processor associated with the second transaction function device (130) is operative to cause a copy of the driver (166) to be stored in the data store (162). The second transaction function device (130) is operative responsive to the driver (166). The first transaction function device (168) interacts with the second transaction function device (130) to carry out a financial transaction with the machine responsive to operation of the driver (166) (Figure 4-8; page 11, lines 3-21; page 20, lines 4 to page 25, line 12).

With respect to independent claim 10

Another exemplary form of the invention is directed to an automated transaction machine (10) (Figure 1; page 1, lines 7-12; page 17, lines 1-2) comprising a plurality of transaction function devices (12, 14, 16, 18) (page 9, lines 13-15; page 17, lines 2-5). The described transaction functions devices are also referred to as transaction services. At least one of the transaction function devices includes a sheet dispenser such as a bill dispenser (14, 272) (Figures 1 and 8). Each one of the transaction function devices includes an associated device computer (118) (Figure 3; page 10, lines 8-9; page 20, line 5).

At least one of the device computers is programmed so that operative connection of a first transaction function device (268) to the machine automatically causes the first transaction function device (268) to coordinate operation with at least one other transaction function device (262) in carrying out a financial transaction which includes the dispense of at least one sheet from the sheet dispenser (272). The first transaction function device is operative to communicate a device driver (264) from the first transaction function device (268) to the at least one other transaction function device (262). The at least one of the device computers of the at least one other transaction function device (262) is operative responsive to the device driver (264) communicated from the first transaction function device (268) to communicate (274, 276) with the first transaction function device (268) (Figure 8; page 23, line 22 to page 27, line 9).

(vi)   GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

The grounds to be reviewed in this appeal are:

Whether Appellants' claims 1-11, 45 and 46 are unpatentable under 35 U.S.C. §

103(a) over Coutts, et al., U.S. Patent No. 6,311,165 ("Coutts").

ARGUMENT

Coutts (U.S. Patent No. 6,311,165)

Coutts is directed to a system in which peripheral devices of an ATM (11) (Figure 1) individually download software modules from a remote server (16) (Column 3, lines 60-63; Column 8, lines 51-52; Column 9, lines 45-46). Coutts teaches that a communication link (17) may extend from the individual peripheral devices so that they are direct clients of the server (Abstract, Column 9, lines 11-14). Coutts also specifically teaches that "software modules are not first downloaded to an intermediate location and then copied to the peripherals 64 from the intermediate location" (Column 21, lines 25-27).

The Applicable Legal Standards

Before a claim may be rejected on the basis of obviousness pursuant to 35 U.S.C. § 103, the Patent Office bears the burden of establishing that all the recited features of the claim are known in the prior art. This is known as *prima facie* obviousness. To establish *prima facie* obviousness, it must be shown that all the elements and relationships recited in the claim are known in the prior art. If the Office does not produce a *prima facie* case, then the Appellants are under no obligation to submit evidence of nonobviousness. MPEP § 2142.

The teaching, suggestion, or motivation to combine the features in prior art references must be clearly and particularly identified in such prior art to support a rejection on the basis of obviousness. It is not sufficient to offer a broad range of sources and make conclusory statements. *In re Dembiczak*, 175 F.3d 994, 999, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999).

Even if all of the features recited in the claim are known in the prior art, it is still not proper to reject a claim on the basis of obviousness unless there is a specific teaching, suggestion, or motivation in the prior art to produce the claimed combination. *Panduit Corp. v. Dennison Mfg. Co.*, 810 F.2d 1561, 1568, 1 USPQ2d 1593 (Fed. Cir. 1987). *In re Newell*, 891 F.2d 899, 901, 902, 13 USPQ2d 1248, 1250 (Fed. Cir. 1989).

The evidence of record must teach or suggest the recited features. An assertion of basic knowledge and common sense not based on any evidence in the record lacks substantial evidence support. *In re Zurko*, 258 F.3d 1379, 59 USPQ2d 1693 (Fed. Cir. 2001).

A determination of patentability must be based on evidence of record. *In re Lee*, 277 F.3d 1338, 61 USPQ2d 1430 (Fed. Cir. 2002).

It is respectfully submitted that the Action from which this appeal is taken does not meet these burdens.

The 35 U.S.C. § 103 (a) Rejections

Rejection under 35 U.S.C. § 103(a) over Coutts

Claims 1-11, 45 and 46 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Coutts. These rejections are respectfully traversed.

Claim 1

Appellants respectfully submit that Coutts does not disclose or suggest at least the following features recited in claim 1:

- the second transaction function device is operative to communicate a device driver from the second transaction function device to the data store for storage in the data store;

- the first transaction function device is operative to access the device driver from the data store; and

- the device computer processor associated with the first transaction function device is operative responsive to the device driver, to interact with the second transaction function device in carrying out a financial transaction with the automated transaction machine.

Coutts teaches a system which has the opposite direction of communication compared to the recited invention. In Coutts devices only download software from a server (Column 3, lines 60-63; Column 8, lines 51-52; Column 9, lines 45-46). Coutts does not disclose or suggest uploading software from a device to the server or any other data store. Further Coutts specifically teaches away from communicating device drivers from devices to a data store. Rather Coutts expressly teaches that "software modules are not first downloaded to an intermediate location and then copied to the peripherals [3]64 from the intermediate location" (Column 21, lines 25-27). Thus, nowhere in Coutts is it disclosed or suggested that the server of Coutts or any other data store, receives device drivers for a transaction function device from the transaction function devices.

With respect to these features, the Office admits that Coutts does not disclose that a transaction function device of an ATM or an automated transaction machine, is operative to communicate a device driver from the transaction function device to a data store for storage in

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the data store. However, even though the Office admits that Coutts does not teach this feature, the Office asserts that "Official notice is taken that" this step "is old and well known in the art." The Action further asserts that "Communication of a device driver from the device to a data store helps synchronization of transaction events making the process more efficient" and it "would have been obvious to one with ordinary skill in the art at the time the invention was made to include this step to the disclosure of Coutts." In addition the Action asserts that the "combination of the teachings taken as a whole suggests that the users of the device would have benefitted from increased efficiency in processing the transaction."

The Appellants respectfully disagree. The Office has provided no evidence to support these assertions. For example, where in the prior art is it shown that "Communication of a device driver from the device to a data store helps synchronization of transaction events making the process more efficient"? There is no such teaching, suggestion or motivation in Coutts and the Office has provided no other citation or evidence of a prior art teaching, suggestion, or motivation to modify Coutts as asserted.

The Office is not permitted to rely on unsupported conclusory assertions as the basis for rejecting claims. Appellants challenge the Action's relied upon "Official Notice" assertion on the basis that it is not supported by any reference to prior art of record. The determination of patentability must be based on evidence of record, not on unsubstantiated assertions of "Official notice". An assertion of basic knowledge and common sense (which is the current situation) not based on any evidence in the record lacks substantial evidence support. *In re Zurko*, supra. *In re Lee*, supra. Appellants respectfully submit that in light of the Action's admission that Coutts fails

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to disclose or suggest all of the recited features and relationships, and the lack of any other evidence of record to support the rejection, the rejection is not legally valid.

Furthermore, Appellants respectfully submit that Coutts lacks many more of the recited features and relationships than those admitted in the Action. For example, nowhere in Coutts is it disclosed or suggested that other transaction function devices of an ATM or automated transaction machine are operative to access device drivers from a data store, which device drivers were communicated to the data store from other transaction function devices in the ATM or automated transaction machine. In addition, nowhere in Coutts is it disclosed or suggested that a transaction function device is operative responsive to a device driver accessed from the data store, to interact with another transaction function device in the machine that originally communicated the device driver to the data store.

Appellants respectfully submit that the Office has not established *prima facie* obviousness. Coutts does not disclose or suggest the features and relationships that are specifically recited in the claims. Nor has the Office cited any other prior art which shows the features and relationships missing from Coutts. Nor is there any prior art teaching, suggestion, or motivation cited for modifying Coutts so as to produce the claimed invention. It would not have been obvious to one having ordinary skill in the art to have modified Coutts to have produced the claimed invention. Appellants respectfully submit that the 35 U.S.C. § 103(a) rejection is improper and should be withdrawn.

Claim 2

Claim 2 depends from claim 1. Coutts does not disclose or suggest that a device computer processor associated with a first transaction function device of an automated transaction machine, is operative responsive to a device driver received from a second transaction function of the machine to communicate with the second transaction function device through a network of the machine. Thus, the Office has not established *prima facie* obviousness with respect to claim 2.

Claim 3

Claim 3 depends from claim 2. Coutts does not disclose or suggest that a device driver received by a first transaction function device from a second transaction function device of an automated transaction machine, is a hardware independent software component that is operative in the device computer processor associated with the first transaction function device. The Office has not established *prima facie* obviousness with respect to claim 3.

Claim 4

Appellants' remarks in support of the patentability of claim 1 are incorporated herein by reference. Appellants respectfully submit that Coutts does not disclose or suggest:

- the device computer processor associated with the second transaction function device is operative to cause the driver to be stored in the data store; and
- the first transaction function device interacts with the second transaction function device responsive to operation of the driver.

The asserted portions of Coutts relied on in the Action (Column 21, lines 4-36) as a basis to reject claim 4, do not disclose or suggest that a first transaction function device interacts with a second transaction function device responsive to operation of a driver, which driver is caused to be stored in a data store by a computer processor of the second transaction function device. Rather this portion of Coutts teaches away from the features recited in claim 4 by stating "that each peripheral 364 has independent access to the server 334 and is operable to download software modules directly therefrom (i.e. software modules are not first downloaded to an intermediate location and then copied to the peripherals [3]64 from the intermediate location)" (Column 21, lines 24-28). Thus Coutts alone does not teach or suggest the recited features and relationships.

The Action also attempts to support the rejection of claim 4 by referencing the discussion of claim 1 in the Action. However, the Action does not state which portions of the discussion of claim 1 are relevant to features recited in claim 4. Thus Appellants have been forced to speculate as to which portions of Coutts or the "Official notice" statement discussed with respect to claim 1, are allegedly relevant to the rejection of claim 4. As Coutts does not disclose or suggest each of the features and relationships recited in claim 4 as discussed above, it is presumed that the Official notice statement with respect to claim 1 is being referenced to show (without any evidentiary support) that these missing features from Coutts are allegedly "old and well known in the art" and would have been obvious to include in Coutts.

However as discussed previously, the determination of patentability must be based on evidence of record, not on unsubstantiated assertions presented under the guise of "Official notice". An assertion of basic knowledge and common sense not based on any evidence in the

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record lacks substantial evidence support. *In re Zurko*, supra. *In re Lee*, supra. Because the Office has failed to cite prior art which shows the features which are missing from Coutts, and because the Office has failed to cite any prior art teaching, suggestion or motivation to modify Coutts to include these missing features, the rejection is not legally valid.

Appellants respectfully submit that the Office has not established a *prima facie* showing of obviousness. Coutts does not disclose or suggest the features and relationships that are specifically recited in the claims. Nor has the Office cited any other prior art which shows the features and relationships missing from Coutts. Nor is there any prior art teaching, suggestion, or motivation cited for modifying Coutts so as to produce the claimed invention. It would not have been obvious to one having ordinary skill in the art to have modified Coutts to have produced the claimed invention. Appellants respectfully submit that the 35 U.S.C. § 103(a) rejection is improper and should be withdrawn.

Claim 5

Claim 5 depends from claim 4. Coutts does not disclose or suggest that a device computer processor associated with a first transaction function device of an automated transaction machine is operative to acquire a device driver from a data store, which device driver was caused to be stored in the data store by a second transaction function device of the machine. The Office has not established *prima facie* obviousness with respect to claim 5.

Claim 6

Claim 6 depends from claim 2. Coutts does not disclose or suggest that a device driver received by a first transaction function device of an automated transaction machine from a second transaction function device of the machine, is operative in a virtual machine of the first transaction function device. The Office has not established *prima facie* obviousness with respect to claim 6.

Claim 7

Claim 7 depends from claim 2. Coutts does not disclose or suggest a device driver received by a first transaction function device from a second transaction function device of an automated transaction machine, which device driver includes a method that is operative to cause the second transaction function device to perform a portion of a financial transaction. In addition, Coutts does not disclose or suggest the first transaction function device is operative to invoke a method of a device driver received from the second transaction function device. The Office has not established *prima facie* obviousness with respect to claim 7.

Claim 8

Claim 8 depends from claim 1. Coutts does not disclose or suggest that a device computer processor associated with a first transaction function device of an automated transaction machine, is operative to cause a second transaction function device of the machine to perform a portion of a transaction responsive to a remote procedure call by a device driver

received from the second transaction function device. The Office has not established *prima facie* obviousness with respect to claim 8.

Claim 9

Claim 9 depends from claim 1. Coutts does not disclose or suggest that a first transaction function device of an automated transaction machine is responsive to a device driver received from a second transaction function device of the machine, to interact with the second transaction function device in carry out a dispense of a sheet from a sheet dispenser of the second transaction function device. The Office has not established a *prima facie* showing of obviousness with respect to claim 9.

Claim 10

Appellants' remarks in support of the patentability of claim 1 are incorporated herein by reference. It is respectfully submitted that Coutts does not disclose or suggest as recited in claim 10 at least the following features:

- the first transaction function device is operative to communicate a device driver from the first transaction function device to the at least one other transaction function device; and

- the at least one of the device computers of the at least one other transaction function device, is operative responsive to the device driver communicated from the first transaction function device, to communicate with the first transaction function device.

Nowhere in Coutts is it disclosed or suggested that a transaction function device of an ATM or automated transaction machine is operative to communicate a device driver to at least one other transaction function device in the machine. Further the Action admits in the discussion of claim 1 that this feature is not disclosed in Coutts.

In addition, the Action references Column 25, lines 25-36 of Coutts as being relevant to claim 10. However, this portion of Coutts does not support the rejection. Rather, this portion of Coutts teaches away from claim 10 by stating that "Appropriate software modules can be readily downloaded by a media dispenser from a server at run time without the need to store every possible driver software module in the terminal housing the dispenser" (Column 25, lines 32-35).

The Action further attempts to support the rejection of claim 10 by referencing the discussion of claim 1 in the Action. However, the Action does not state which portions of the discussion of claim 1 are relevant to features recited in claim 10. Thus Appellants have been forced to speculate as to which portions of Coutts or the "Official notice" statement discussed with respect to claim 1, are allegedly relevant to the rejection of claim 10. As Coutts does not disclose or suggest each of the features and relationships recited in claim 10 as discussed above, it is presumed that the Official notice statement with respect to claim 1 is being referenced to show (without evidentiary support) that these features missing from Coutts are allegedly "old and well known in the art" and would have been obvious to include in Coutts.

However as discussed previously, the determination of patentability must be based on evidence of record, not on unsubstantiated assertions under the guise of "Official notice". An assertion of basic knowledge and common sense not based on any evidence in the record lacks substantial evidence support. *In re Zurko*, supra. *In re Lee*, supra. Appellants respectfully

submit that in light of the Action's admission that Coutts fails to disclose or suggest all of the recited features and relationships recited in claim 10, the lack of any citation to prior art which shows the features missing from Coutts and the failure in the Action to cite any prior art teaching, suggestion or motivation for modifying Coutts to include the features recited in the claims missing from Coutts, the rejection is not legally valid.

In addition, Appellants respectfully submit that Coutts lacks many more of the recited features and relationships than those admitted in the Action. For example, nowhere in Coutts is it disclosed or suggested that the transaction function device receiving the device driver is operative in response to the device driver, to communicate with another transaction function device which had communicated the device driver to the device that received the device driver.

Appellants respectfully submit that the Office has not established a *prima facie* showing of obviousness. Coutts does not disclose or suggest the features and relationships that are specifically recited in the claims. Nor has the Office cited any other prior art which shows the features and relationships missing from Coutts. Nor is there any prior art teaching, suggestion, or motivation cited for modifying Coutts so as to produce the claimed invention. It would not have been obvious to one having ordinary skill in the art to have modified Coutts to have produced the claimed invention. Appellants respectfully submit that the 35 U.S.C. § 103(a) rejection is improper and should be withdrawn.

Claim 11

Claim 11 depends from claim 10. Coutts does not disclose or suggest that each of the plurality of transaction function devices includes an associated device driver stored therein and is

operative to communicate the associated device driver to a data store for storage therein. Coutts further does not disclose or suggest that at least one other transaction function device is operative to access the device driver from the data store, which driver is associated with and communicated from the first transaction function device. The Office has not established *prima facie* obviousness with respect to claim 11.

Claim 45

Claim 45 depends from claim 10. Coutts does not disclose or suggest that a transaction function device of an automated transaction machine with a cash dispenser is operative to communicate a device driver to at least one other transaction function device in the machine. The Office has not established *prima facie* obviousness with respect to claim 45.

Claim 46

Claim 46 depends from claim 9. Coutts does not disclose or suggest that a first transaction function device of an automated transaction machine is responsive to a device driver received from a second transaction function device of the machine, to interact with the second transaction function device in carrying out a dispense of a sheet from a cash dispenser of the second transaction function device. The Office has not established *prima facie* obviousness with respect to claim 46.

CONCLUSION

Each of Appellants' pending claims specifically recites features and relationships that are neither disclosed nor suggested in any of the applied prior art. Furthermore, the applied prior art is devoid of any teaching, suggestion, or motivation for producing the recited invention. For these reasons it is respectfully submitted that all the pending claims are allowable.

Respectfully submitted,

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CLAIMS APPENDIX

1.   An automated transaction machine comprising:

a plurality of transaction function devices, wherein each transaction function device includes an associated device computer processor, wherein at least one device computer processor associated with a first transaction function device is operative responsive to being placed in operative connection with at least one other device computer processor associated with a second transaction function device, to cause the first transaction function device to become automatically interoperative with the second transaction function device;

a data store in operative connection with both the first transaction function device and the second transaction function device, wherein the second transaction function device is operative to communicate a device driver from the second transaction function device to the data store for storage in the data store, wherein the first transaction function device is operative to access the device driver from the data store, wherein the device computer processor associated with the first transaction function device is operative responsive to the device driver to interact with the second transaction function device in carrying out a financial transaction with the automated transaction machine.

2.   The automated transaction machine according to claim 1, and further comprising a

network, wherein the network is in operative connection with the at least one data store, the first

transaction function device and the second transaction function device, wherein the device

computer processor associated with the first transaction function device is operative responsive

to the device driver to communicate with the second transaction function device through the

network.

3.   The automated transaction machine according to claim 2, wherein the driver is a

hardware independent software component that is operative in the device computer processor

associated with the first transaction function device.

4.   An automated transaction machine comprising:

a plurality of transaction function devices, wherein each transaction function device

includes an associated device computer processor, wherein at least one device computer

processor associated with a first transaction function device is operative responsive to

being placed in operative connection with at least one other device computer processor

associated with a second transaction function device, to cause the first transaction

function device to become automatically interoperative with the second transaction

function device, wherein the first transaction function device interacts with the second

transaction function device in carrying out a financial transaction with the automated

transaction machine;

a network, wherein the network is in operative connection with at least one data store, wherein the data store includes a transaction function device driver, wherein the device computer processor associated with the second transaction function device is operative to cause the driver to be stored in the data store, wherein the second transaction function device is operative responsive to the driver, wherein the first transaction function device interacts with the second transaction function device responsive to operation of the driver.

5. The automated transaction machine according to claim 4, wherein the device computer processor associated with the first transaction function device is operative to acquire the driver from the data store.

6. The automated transaction machine according to claim 2, wherein the device computer processor associated with the first transaction function device includes a virtual machine, wherein the device driver is operative in the virtual machine.

7. The automated transaction machine according to claim 2, wherein the device driver includes a method that is operative to cause the second transaction function device to perform a portion of the transaction, wherein the device computer processor associated with the first transaction function device is operative to invoke the method.

8. The automated transaction machine according to claim 1, wherein the device computer processor associated with the first transaction function device is operative to cause the

second transaction function device to perform a portion of the transaction responsive to a remote procedure call by the device driver.

9.   The automated transaction machine according to claim 1, wherein the second transaction function device includes a sheet dispenser, and wherein the transaction includes the dispense of a sheet from the sheet dispenser.

10.   An automated financial transaction machine comprising a plurality of transaction function devices, wherein at least one of the transaction function devices includes a sheet dispenser, and wherein each one of the transaction function devices includes an associated device computer, and wherein at least one of the device computers is programmed so that operative connection of a first transaction function device to the machine automatically causes the first transaction function device to coordinate operation with at least one other transaction function device in carrying out a financial transaction which includes the dispense of at least one sheet from the sheet dispenser, wherein the first transaction function device is operative to communicate a device driver from the first transaction function device to the at least one other transaction function device, wherein the at least one of the device computers of the at least one other transaction function device is operative responsive to the device driver communicated from the first transaction function device to communicate with the first transaction function device.

11.   The automated transaction machine according to claim 10, further comprising a database in operative connection with each of the transaction funciton devices, wherein each of

the plurality of transaction function devices includes an associated device driver stored therein and is operative to communicate the associated device driver to the data store for storage therein, wherein the at least one other transaction function device is operative to access the device driver associated with the first transaction function device from the data store.

45. The automated transaction machine according to claim 10, wherein the sheet dispenser comprises a cash dispenser.

46. The automated transaction machine according to claim 9, wherein the sheet dispenser comprises a cash dispenser.

(ix) **EVIDENCE APPENDIX**

(None)

(x)   **RELATED PROCEEDINGS APPENDIX**

(None)